

**LEECHTISHMAN**  
LEECH TISHMAN FUSCALDO & LAMPL

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March 18, 2024

Honorable Lisa G. Beckerman  
United States Bankruptcy Court  
One Bowling Green  
New York, New York 10004

RE: 4452 Broadway Mazel LLC, Case No. 23-11832 (LGB)

Dear Judge Beckerman:

As Your Honor is aware, my firm represents 4452 Broadway Mazel LLC, the Debtor in the above Chapter 11 case. I am writing to request a telephonic conference call to discuss an event that recently occurred in the case which may impact, *inter alia*, the March 27<sup>th</sup> confirmation hearing. Accordingly, we are seeking the Court's input as to how to proceed.

Last week I received an email from an employee at Blakie & Company, a bonding broker, indicating their firm was holding collateral belonging to the Debtor, and after tracking me down as counsel, they intended to release the funds to counsel. I asked them not to send anything until they could provide information as to who posted the collateral.

The next day, approximately Thursday of last week, before sending documentation, Blakie wired the sum of \$1,002,000 into my firm's escrow account. On Friday of last week, I received some backup — mainly brokerage commission bills — but everything which was sent indicated this cash collateral was the Debtor's funds.

Of course, this creates an issue for the Debtor as all the solicitation materials have been served and we have started to receive ballots, but without the solicitation materials mentioning the \$1,002,000 and how it would be distributed under the Plan.

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Accordingly, we need some input from the Court as how to appropriately proceed and what supplementary materials, if any, might need to be circulated, while still adhering to the April 15, 2024 closing deadline.

The Debtor and the Mortgage Lender have been advised of this development.

I am available all-day Monday other than 1:45 p.m. and 3:30 p.m., and all day Tuesday except 11:30 a.m. to 1:15 p.m. for a conference.

Respectfully submitted,

*/s/ Fred Ringel*

Fred B. Ringel

cc: Jerry Feuerstein (via email)  
Martin Bunin (via email)  
Tara Tiantian (via email)